REMARKS

The Final Office Action dated November 27, 2007, has been received and carefully noted. The following remarks are submitted as a full and complete response thereto.

Accordingly, claims 1-40 are currently pending in the application, of which claims 1 and 21 are independent claims. Claims 41-60 are withdrawn in view of Applicants' Response filed on September 7, 2007, in response to the Restriction Requirement mailed on September 5, 2007.

In view of the following Remarks, Applicants respectfully request reconsideration and timely withdrawal of the pending rejections for the reasons discussed below.

Claim Rejections under 35 U.S.C. §101

Claims 21-40 are rejected under 35 U.S.C. §101 because the claimed invention is allegedly directed to non-statutory subject matter. The Office Action alleged that "the apparatus of claims 21-40 are reasonably interpreted as functional descriptive material, per se" (See Office Action on page 3, paragraphs 6 and 7). Applicants respectfully traverse this rejection for at least the following reasons.

Applicants respectfully submit that the rejections of claims 21-40 under 35 U.S.C. §101 are improper. The Office Action stated:

Claims 21-40 are directed to a network device for controlling a flow of data in a wireless network. However, on page 50, paragraph [0156] of the instant application's specification, the Applicant

discloses "The present invention can be implemented totally...through software." Therefore, it appears that the network device would reasonably be interpreted by one of ordinary skill in the art as software, per se. There is no element positively recited as part of the network device. As such, it believed that the apparatus of claims 21-40 and 51-60 are reasonably interpreted as functional descriptive material, per se (See Office Action on page 3, paragraph 7). (emphasis added)

In the *Response to Arguments*, the Final Office Action noted that "the original disclosure...discloses 'The present invention can be implemented **totally...through software**.' Therefore, it appears that the network device would reasonably be interpreted by one of ordinary skill in the art as software, per se. There is no element positively recited as part of the network device" (See Office Action on page 17).

Further, the Final Office Action noted that the "examiner indeed gave claims 21-40 their broadest reasonable interpretation in light of the supporting disclosure on page 50, paragraph [0156] of the instant application's specification" (*Id.*).

As previously noted in their Response of June 12, 2007, Applicants respectfully submit that the Office Action improperly imports claim limitations of one disclosed embodiment described in the specification to limit the scope of the claims (See MPEP §2111.01 II.). Applicants' specification discloses multiple embodiments, where at least one embodiment describes statutory subject matter pursuant to 35 U.S.C. §101 for the network device of claims 21-40 (See page 50, paragraph [0156]). By self-editing the disclosure of the specification to describe "The present invention can be implemented totally...through software," the Office Action improperly excludes the limitation for

partial implementation of the present invention through software, and further disregards the fact that "the present invention can be implemented totally or partially through software" as disclosed on page 50 in paragraph [0156] (emphasis added).

Further, Applicants respectfully submit that the Office Action's conclusion that it appears that the network device would reasonably be interpreted by one of ordinary skill in the art as software, *per se*, and that there is no element positively recited as part of the network device is improper. The disclosure of the specification clearly describes at least one embodiment illustrating the structural elements of the network device recited in claims 21-40 (See at least page 2, paragraph [0006], to page 50, paragraph [0156]). Accordingly, contrary to the Office Action's conclusions, Applicants have positively described and illustrated structural elements for the network device recited in claims 21-40. Therefore, one of ordinary skill in the art would not have reasonably understood that the present invention is limited <u>only</u> to software.

Further, contrary to the Office's assertions on page 17 of the Final Office Action, Applicants respectfully submit that the Office fails to give claims 21-40 their broadest reasonable interpretation in light of the supporting disclosure on page 50, paragraph [0156] of the instant application's specification. As noted above, the Office has self-edited the disclosure of the specification to support its arguments, failing to acknowledge all of the embodiments described in the specification with regard to the limitations recited in claims 21-40. Therefore, the Office did not give the broadest reasonable interpretation

in light of the supporting disclosure on page 50, paragraph [0156], and at least page 2, paragraph [0006], to page 50, paragraph [0156], to the limitations of claims 21-40.

The Final Office Action further noted that the "Applicant did not provide explicit definitions of the elements recited in claims 21-40 in the original disclosure. Therefore, the original disclosure does not contain any statement instructing one to interpret these elements are always referring to hardware, or a combination of hardware and software rather than totally...through software (software per se). Any special meaning assigned to a term "must be sufficiently clear in the specification that any departure from common usage would be so understood by a person of experience in the field of invention" (Id.).

Applicants respectfully submit that one of ordinary skill in the art of wireless communications would have understood that the present invention may include hardware, software, or a combination of hardware and software, as described in Applicants' specification on at least page 2, paragraph [0006], to page 50, paragraph [0156]. Contrary to the Office's conclusions, Applicants did not state that the elements described in the aforementioned portions of the disclosure are always either hardware or a combination of hardware and software. Rather, the aforementioned portions of Applicants' disclosure describe that embodiments of the present invention can be hardware, software, or a combination of hardware and software. Thus, one of ordinary skill in the art would have understood that embodiments of the present invention are not software, per se. Applicants note that the Merriam-Webster Dictionary defines "per se"

as "by, of, or in itself." Accordingly, Applicants respectfully submit that one of ordinary skill in the art would have understood that embodiments of the network device recited in claims 21-40 can be hardware, software, or a combination of hardware and software; and therefore, the term "network device" in view of the disclosure of the specification is sufficiently clear from common usage as understood by one of ordinary skill in the art of wireless communications.

Therefore, Applicants respectfully submit that the Office's conclusions with respect to claims 21-40 are improper. Thus, claims 21-40 are directed to statutory subject matter.

Accordingly, Applicants respectfully request that the rejection of claims 21-40 under 35 U.S.C. §101 be withdrawn and submit that claims 21-40 are in condition for allowance.

Claim Rejections under 35 U.S.C. §103(a)

Claims 1-3, 9, 16-18, 21-23, 29, and 36-38

The Final Office Action rejected claims 1-3, 9, 16-18, 21-23, 29, and 36-38 under 35 U.S.C. §103(a) as being allegedly unpatentable as obvious over Ichikawa, *et al.* (U.S. Patent No. 6,307,837) ("Ichikawa") in view of WaveLink SNC24 Version 4 Copyright 1996-2000 ("WaveLink SNC24") and WaveLink Mobile Manager Version 5.2 Users Guide Revised 6/18/2002 ("WaveLink Mobile Manager"). Applicants respectfully

submit that the claims recite subject matter that is neither disclosed nor suggested in the combination of Ichikawa, WaveLink SNC24, and WaveLink Mobile Manager.

Claims 1-3, 9, and 16-18

Claim 1, upon which claims 2-20 are dependent, recites a process of controlling a flow of data in a wireless network and providing wireless access to the wireless network by wireless devices. The process includes receiving data from a wireless device by a network device through one access point of a plurality of access points in communication with the network device, indicating a client identifier for the wireless device. The process also includes forwarding the client identifier to an authentication server, mediating authentication of the wireless device with the authentication server, evaluating data packets received from portions of the wireless network and from the plurality of access points, and passing the received data packets to portions of the wireless network and to the plurality of access points based on the evaluation of the received data packets. The network device periodically polls for a status of the wireless device from the access The access points and the network device exchange information relating to point. configuration, status, and client session statuses of the access points through a messaging protocol.

Claims 21-23, 29, and 36-38

Claim 21, upon which claims 22-40 are dependent, recites a network device for controlling a flow of data in a wireless network and providing wireless access to the wireless network by wireless devices. The network device includes receiving means for receiving data from a wireless device by the network device through one access point of a plurality of access points in communication with the network device, indicating a client identifier for the wireless device. The network device also includes forwarding means for forwarding the client identifier to an authentication server, mediating means for mediating authentication of the wireless device with the authentication server, evaluating means for evaluating data packets received from portions of the wireless network and from the plurality of access points, and passing means for passing the received data packets to portions of the wireless network and to the plurality of access points based on the evaluation of the received data packets. The network device is configured to periodically poll for a status of the wireless device from the access point. The access points and the network device exchange information relating to configuration, status, and client session statuses of the access points through a messaging protocol.

As will be discussed below, Ichikawa in view of WaveLink SNC24 and WaveLink Mobile Manager fails to disclose or suggest every element recited in claims 1-3, 9, 16-18, 21-23, 29, and 36-38, and therefore fails to provide the features discussed above.

Ichikawa is directed to a method and base station for packet transfer to resolve the problem of fraudulent access to user LANs through falsified source addresses so that only pre-registered terminals are permitted to transfer packets with specific data networks. The base station includes a packet network which receives a data packet from an authorized packet terminal, decodes an encrypted data packet, detects tampering in the encrypted data packet, checks the identity of a source address and an identifier encrypted in the data packet, and sends the data packet to a destination address if the identity is registered (Abstract; col. 3, line 12 to col. 6, line 2).

WaveLink SNC24 is directed to a first Spectrum24 software-based network controller for Windows NT and Windows 95/98, which allows a user to configure and manage the Spectrum24 network remotely from any Window host on the network. The WaveLink SNC24 provides recognition of Access Points on the network and a direct administrative interface to each Access Point (page 14: *Agent Based Administration*).

WaveLink Mobile Manager is directed to a remote deployment, management, and security tool for wireless networks providing a common interface for Access Point configuration. Similar to the WaveLink SNC24, the WaveLink Mobile Manager provides recognition of Access Points on a network and a direct administrative interface to each Access point (page 3: About WaveLink Mobile Manager; page 4: Agent-based Administration).

Applicants respectfully submit that the Office Action fails to establish a *prima* facie case of obviousness.

Applicants respectfully submit that one of ordinary skill in the art at the time the invention was made would not have found the combination of the teachings of Ichikawa with the teachings of WaveLink SNC24 and WaveLink Mobile Manager obvious because the proposed modification of Ichikawa with the teachings of WaveLink SNC24 and WaveLink Mobile Manager would render Ichikawa unsatisfactory for its intended purpose.

Specifically, Ichikawa discloses a packet network illustrated in FIG. 8. Ichikawa discloses a plurality of relay nodes 7-9 for switching packets. Each relay node 7-9 has routing information based on destination address 4-1 and VLAN-ID 4-3, and transfers the packet using optimal paths based on the routing information. For example, upon receiving a packet, relay node 7-9 correlates and memorizes the information from the received packet, i.e. the terminal address shown by the source address 4-2 and the port which received the packet, and VLAN-ID 4-3 and the port which received the packet. Next, if the received packet is a unicast packet, relay node 7-9 sends the received packet to the port corresponding to the terminal address indicated by the destination address 4-1. On the other hand, if the received packet is a broadcast packet or a multicast packet, the relay node 7-9 sends the packet to all the ports corresponding to the VLAN-IDs 4-3. Relay node 7-9 also serves to connect the wireless backbone packet network 7-8 to terminal authentication server 7-8 (Ichikawa, col. 11, lines 30-57). Hence, relay node 7-9 functions as a switch for routing packets and a connection element between wireless backbone packet network 7-8 and terminal authentication server 7-8.

In supporting its rejections of claims 1-3, 9, 16-18, 21-23, 29, and 36-38, the Office indicated that the relay node 7-9 corresponds to Applicants' network device (See Office Action on page 5, lines 4-5).

As noted in the Office Action on page 6, Ichikawa fails to disclose or suggest, at least "wherein the network device periodically polls for a status of the wireless device from the access point, and wherein the access points and the network device exchange information relating to configuration, status, and client session statuses of the access points through a messaging protocol" as recited in claim 1, and similarly recited in claim 21.

Whereas, WaveLink SNC24 and WaveLink Mobile Manager disclose Spectrum24 Agent software which provides remote configuration and administrative control over the access points (See WaveLink SNC24, page 10). WaveLink SNC 24 further discloses that the Spectrum24 Agent software is performed from a separate Windows-based application, the WaveLink SNC24 Administrator. The WaveLink SNC24 Administrator has been designed to connected with multiple Spectrum24 Agents located across both local and wide area networks for administering Access Points and Spectrum24 activity associated with that agent (See WaveLink SNC24, page 15). WaveLink SNC24 and WaveLink Mobile Manager disclose that the Spectrum24 Agent software provides many features for administering control over the access points.

Therefore, Ichikawa discloses that relay node 7-9 which functions as a switch for routing packets and a connection element between wireless backbone packet network 7-8

and terminal authentication server 7-8. Whereas, WaveLink SNC24 and WaveLink Mobile Manager disclose Spectrum24 Agent software which provides remote configuration and administrative control over the access points. Accordingly, one of ordinary skill in the art at the time the invention was made would not have found the combination of Ichikawa with the teachings of WaveLink SNC24 and WaveLink Mobile Manager because such a combination would render Ichikawa unsatisfactory for its intended purpose. In other words, if the Spectrum24 Agent software, as taught by WaveLink SNC24 and WaveLink Mobile Manager, which is configured to provide remote configuration and administrative control over the access points, was incorporated into the relay node 7-9 of Ichikawa, the relay node 7-9 of Ichikawa would be rendered unsatisfactory for its intended purpose. Further, one of ordinary skill in the art would not have found it obvious to incorporate software into a switch whose function is for routing and transferring packets. The Office Action fails to further demonstrate that relay node 7-9 would be configured to utilize the Spectrum24 Agent software disclosed in WaveLink SNC24 and WaveLink Mobile Manager.

Therefore, Ichikawa in view of WaveLink SNC24 and WaveLink Mobile Manager fails to disclose or suggest, at least, "wherein the network device periodically polls for a status of the wireless device from the access point, and wherein the access points and the network device exchange information relating to configuration, status, and client session statuses of the access points through a messaging protocol" as recited in claim 1, and similarly recited in claim 21.

Claims 2-3, 9, 16-18, 22-23, 29, and 36-38 depend from claims 1 and 21, respectively. Accordingly, claims 2-3, 9, 16-18, 22-23, 29, and 36-38 should be allowable for at least their dependency upon an allowable base claim, and for the specific limitations recited therein.

Therefore, Applicants respectfully request withdrawal of the rejections of claims 1-3, 9, 16-18, 21-23, 29, and 36-38 under 35 U.S.C. §103(a), and respectfully submit that claims 1 and 21, and the claims that depend therefrom, are in condition for allowance.

Claims 10-12 and 30-32

The Final Office Action rejected claims 10-12 and 30-32 under 35 U.S.C. §103(a) as being allegedly unpatentable as obvious over Ichikawa, WaveLink SNC24 and WaveLink Mobile Manager as applied to claims 1-3 and 21-23, and further in view of Awater, *et al.* (U.S. Patent No. 7,173,918) ("Awater"). Applicants respectfully submit that the claims recite subject matter that is neither disclosed nor suggested in the combination of Ichikawa, WaveLink SNC24, WaveLink Mobile Manager, and Awater.

Ichikawa, WaveLink SNC24, and WaveLink Mobile Manager were discussed above.

Awater is directed to a communication system with a plurality of access points and at least one network station, where the network station communicates with one of the plurality of access points through a wireless communication protocol. Each access point is able to monitor its access point traffic load and transmit an access point traffic load

parameter (ATT) to the network station. The network station is able to monitor its network station traffic load, store a network station traffic load parameter (AUTT), receive ATT from the access points, and select a communication with one of the access points using a predetermined cost function taking ATT and AUTT into account (Awater, Abstract).

As noted above with respect to claim 1, Ichikawa in view of WaveLink SNC24 and WaveLink Mobile Manager fails to disclose or suggest every feature recited in claim 1, and similarly recited in claim 21. Awater fails to cure the deficiencies of Ichikawa, WaveLink SNC24, and WaveLink Mobile Manager. Specifically, Awater fails to disclose or suggest, at least, "wherein the network device periodically polls for a status of the wireless device from the access point, and wherein the access points and the network device exchange information relating to configuration, status, and client session statuses of the access points through a messaging protocol" as recited in claim 1, and similarly recited in claim 21.

Accordingly, Ichikawa in view of WaveLink SNC24 and WaveLink Mobile Manager, and further in view of Awater, fails to disclose or suggest every feature recited in claims 1 and 21.

Claims 10-12 and 30-32 depend from claims 1 and 21, respectively. Accordingly, claims 10-12 and 30-32 should be allowable for at least their dependency upon an allowable base claim, and for the specific limitations recited therein.

Therefore, Applicants respectfully request withdrawal of the rejections of claims 10-12 and 30-32 under 35 U.S.C. §103(a), and respectfully submit that claims 1 and 21, and the claims that depend therefrom, are in condition for allowance.

Claims 13, 14, 33, and 34

The Final Office Action rejected claims 13, 14, 33, and 34 under 35 U.S.C. §103(a) as being allegedly unpatentable as obvious over Ichikawa, WaveLink SNC24 and WaveLink Mobile Manager as applied to claims 1-3 and 21-23, and further in view of Fink, *et al.* (U.S. Patent No. 6,496,935) ("Fink"). Applicants respectfully submit that the claims recite subject matter that is neither disclosed nor suggested in the combination of Ichikawa, WaveLink SNC24, WaveLink Mobile Manager, and Fink.

Ichikawa, WaveLink SNC24, and WaveLink Mobile Manager were discussed above.

Fink is directed to a system, device, and method for accelerating packet filtration by supplementing a firewall with a pre-filtering module (Fink, Abstract; col. 2, lines 21-40).

As noted above with respect to claim 1, Ichikawa in view of WaveLink SNC24 and WaveLink Mobile Manager fails to disclose or suggest every feature recited in claim 1, and similarly recited in claim 21. Fink fails to cure the deficiencies of Ichikawa, WaveLink SNC24, and WaveLink Mobile Manager. Specifically, Fink fails to disclose or suggest, at least, "wherein the network device periodically polls for a status of the

wireless device from the access point, and wherein the access points and the network device exchange information relating to configuration, status, and client session statuses of the access points through a messaging protocol" as recited in claim 1, and similarly recited in claim 21.

Accordingly, Ichikawa in view of WaveLink SNC24 and WaveLink Mobile Manager, and further in view of Fink, fails to disclose or suggest every feature recited in claims 1 and 21.

Claims 13, 14, 33, and 34 depend from claims 1 and 21, respectively. Accordingly, claims 13, 14, 33, and 34 should be allowable for at least their dependency upon an allowable base claim, and for the specific limitations recited therein.

Therefore, Applicants respectfully request withdrawal of the rejections of claims 13, 14, 33, and 34 under 35 U.S.C. §103(a), and respectfully submit that claims 1 and 21, and the claims that depend therefrom, are in condition for allowance.

Claims 4, 8, 15, 24, 28, and 35

The Final Office Action rejected claims 4, 8, 15, 24, 28, and 35 under 35 U.S.C. §103(a) as being allegedly unpatentable as obvious over Ichikawa, WaveLink SNC24 and WaveLink Mobile Manager as applied to claims 1-3 and 21-23, and further in view of Engler, *et al.* (U.S. Patent Publication No. 2005/0254652) ("Engler"). Applicants respectfully submit that the claims recite subject matter that is neither disclosed nor

suggested in the combination of Ichikawa, WaveLink SNC24, WaveLink Mobile Manager, and Engler.

Ichikawa, WaveLink SNC24, and WaveLink Mobile Manager were discussed above.

Engler is directed to a method for automatically providing a secure connection between a wireless network including a server and server software installed thereon and a device seeking access to the wireless network (Engler, Abstract; paragraph [0009]).

As noted above with respect to claim 1, Ichikawa in view of WaveLink SNC24 and WaveLink Mobile Manager fails to disclose or suggest every feature recited in claim 1, and similarly recited in claim 21. Engler fails to cure the deficiencies of Ichikawa, WaveLink SNC24, and WaveLink Mobile Manager. Specifically, Engler fails to disclose or suggest, at least, "wherein the network device periodically polls for a status of the wireless device from the access point, and wherein the access points and the network device exchange information relating to configuration, status, and client session statuses of the access points through a messaging protocol" as recited in claim 1, and similarly recited in claim 21.

Accordingly, Ichikawa in view of WaveLink SNC24 and WaveLink Mobile Manager, and further in view of Engler, fails to disclose or suggest every feature recited in claims 1 and 21.

Claims 4, 8, 15, 24, 28, and 35 depend from claims 1 and 21, respectively. Accordingly, claims 4, 8, 15, 24, 28, and 35 should be allowable for at least their dependency upon an allowable base claim, and for the specific limitations recited therein.

Therefore, Applicants respectfully request withdrawal of the rejections of claims 4, 8, 15, 24, 28, and 35 under 35 U.S.C. §103(a), and respectfully submit that claims 1 and 21, and the claims that depend therefrom, are in condition for allowance.

Claims 5, 7, 19, 20, 25, 27, 39, and 40

The Final Office Action rejected claims 5, 7, 19, 20, 25, 27, 39, and 40 under 35 U.S.C. §103(a) as being allegedly unpatentable as obvious over Ichikawa, WaveLink SNC24 and WaveLink Mobile Manager as applied to claims 1-3 and 21-23, and further in view of Numminen, *et al.* (European Patent No. 1073294) ("Numminen"). Applicants respectfully submit that the claims recite subject matter that is neither disclosed nor suggested in the combination of Ichikawa, WaveLink SNC24, WaveLink Mobile Manager, and Numminen.

Ichikawa, WaveLink SNC24, and WaveLink Mobile Manager were discussed above.

Numminen is directed to an access control system for controlling access by wireless terminals to a wireless telecommunications network. (Numminen, Abstract; paragraph [0025]).

As noted above with respect to claim 1, Ichikawa in view of WaveLink SNC24 and WaveLink Mobile Manager fails to disclose or suggest every feature recited in claim 1, and similarly recited in claim 21. Numminen fails to cure the deficiencies of Ichikawa, WaveLink SNC24, and WaveLink Mobile Manager. Specifically, Numminen fails to disclose or suggest, at least, "wherein the network device periodically polls for a status of the wireless device from the access point, and wherein the access points and the network device exchange information relating to configuration, status, and client session statuses of the access points through a messaging protocol" as recited in claim 1, and similarly recited in claim 21.

Accordingly, Ichikawa in view of WaveLink SNC24 and WaveLink Mobile Manager, and further in view of Numminen, fails to disclose or suggest every feature recited in claims 1 and 21.

Claims 5, 7, 19, 20, 25, 27, 39, and 40 depend from claims 1 and 21, respectively. Accordingly, claims 5, 7, 19, 20, 25, 27, 39, and 40 should be allowable for at least their dependency upon an allowable base claim, and for the specific limitations recited therein.

Therefore, Applicants respectfully request withdrawal of the rejections of claims 5, 7, 19, 20, 25, 27, 39, and 40 under 35 U.S.C. §103(a), and respectfully submit that claims 1 and 21, and the claims that depend therefrom, are in condition for allowance.

Claims 6 and 26

Application No.: 10/632,807

The Final Office Action rejected claims 6 and 26 under 35 U.S.C. §103(a) as being allegedly unpatentable as obvious over Ichikawa, WaveLink SNC24, WaveLink Mobile Manager, and Numminen as applied to claims 5 and 25, and further in view of Engler. Applicants respectfully submit that the claims recite subject matter that is neither disclosed nor suggested in the combination of Ichikawa, WaveLink SNC24, WaveLink Mobile Manager, Engler and Numminen.

Ichikawa, WaveLink SNC24, WaveLink Mobile Manager, Engler, and Numminen were discussed above.

As noted above with respect to claims 1 and 21, the combination of Ichikawa, WaveLink SNC24, Numminen, and Engler, fails to disclose or suggest every feature recited in claim 1, and similarly recited in claim 21. Specifically, the combination of the aforementioned references fails to disclose or suggest, at least, "wherein the network device periodically polls for a status of the wireless device from the access point, and wherein the access points and the network device exchange information relating to configuration, status, and client session statuses of the access points through a messaging protocol" as recited in claim 1, and similarly recited in claim 21.

Accordingly, Ichikawa in view of WaveLink SNC24, WaveLink Mobile Manager, and Numminen, and further in view of Engler, fails to disclose or suggest every feature recited in claims 1 and 21.

Claims 6 and 26 depend from claims 1 and 21, respectively. Accordingly, claims 6 and 26 should be allowable for at least their dependency upon an allowable base claim, and for the specific limitations recited therein.

Therefore, Applicants respectfully request withdrawal of the rejections of claims 6 and 26 under 35 U.S.C. §103(a), and respectfully submit that claims 1 and 21, and the claims that depend therefrom, are in condition for allowance.

CONCLUSION

In conclusion, Applicant respectfully submits that Ichikawa, WaveLink SNC24, WaveLink Mobile Manager, Awater, Fink, Numminen, and Engler, alone or in combination, fail to disclose or suggest every claim feature recited in claims 1-40. The distinctions previously noted are more than sufficient to render the claimed invention unobvious. It is therefore respectfully requested that all of claims 1-40 be allowed, and this present application be passed to issuance.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicants' undersigned representative at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicants respectfully petition for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,

Brad Y. Chin

Registration No. 52,738

Customer No. 32294
SQUIRE, SANDERS & DEMPSEY LLP
14TH Floor
8000 Towers Crescent Drive
Tysons Corner, Virginia 22182-2700
Telephone: 703-720-7800

Fax: 703-720-7802

BYC:dlh

Application No.: 10/632,807